

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

<p>HARRY WILLIAMSON, <i>Plaintiff,</i> v. LORAIN COUNTY, et al., <i>Defendants.</i></p>	<p>Case No.: 1:23-cv-01507-JG Judge James S. Gwin Magistrate Judge Jennifer Dowdell Armstrong</p>
<p>PLAINTIFF HARRY WILLIAMSON'S REQUESTS FOR INSPECTION TO DEFENDANT TOM WILLIAMS</p>	

Under Fed. R. Civ. P. 34, Plaintiff Harry Williamson requests that Defendant Tom Williams respond to these requests for inspection within 30 days of service.

INSTRUCTIONS

1. **Definitions.** In answering each request, use the following definitions:
 - A. The word "person" means any natural person, firm, partnership, association, corporation (whether public or private), governmental agency or entity, joint venture, or any other form of business entity.
 - B. The term "document" or "documents" means the original or a copy, regardless of origin or location, of any writing or records of any type or description, whether official or unofficial, including, but not limited to, the original or any copy of any book, pamphlet, periodical, letter, memorandum, telegram, report, record, statement, study, inter- or intra-office communication, handwritten or other note, working paper, publication, permit, ledger and/or journal, whether general or special, chart, paper, graph, survey, index tape, disk, data sheet or data-processing card, or any other written, recorded, transcribed, filed, or graphic matter, however produced or reproduced, to which you have had access or now have access. "Document" or "documents" also includes any magnetically, mechanically, and/or electronically stored, maintained, and/or recorded data, whether the data consists of words, symbols, numbers, graphs, or other matters, including but not limited to email and text messages as well as messages on any social-media or other electronic platform, website, or application (e.g., messages in Facebook messenger, Tweets, Twitter direct messages, or Snapchat).
 - C. "Identify" means:
 1. With respect to a person's name

PLAINTIFF'S
EXHIBIT

known home telephone number, last known business address, last known business telephone number, last known employer, and last known job title. If you do not know the person's name, provide a physical description of the person instead.

2. With respect to a communication: the place of the communication, the date and time of the communication, the participants in the communication, and the substance of the communication.
- D. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside its scope.
- E. The term "current" means as of the date of service of these request.
- F. "Any" includes the word "all," and "all" includes the word "any."
- G. "Relate to" and "relating to" mean regarding, concerning, containing, consisting of, referring to, reflecting, supporting, demonstrating, showing, identifying, mentioning, contradicting, prepared in connection with, used in preparation for, pertaining to, having any relationship to, evidencing, constituting evidence of, or being in any way legally, logically, or factually connected with the matter discussed.

2. For each request or part of a request that you object to as vague, please seek clarification as to the scope of the request.¹
3. **Privileges:** For each request or part thereof that you refuse to answer on grounds of privilege, state:
 - A. The specific privilege asserted;
 - B. The basis for the privilege; and
 - C. The identity of the documents and/or information claimed to be privileged.
4. To preserve paper and reduce copying costs, Plaintiff requests that where feasible, documents responsive to the requests below be provided through an online file-sharing service rather than hard copy. If you do not have such a service available, Plaintiff can provide one free of charge. Plaintiff requests that, with the exceptions noted below, each page of each document be Bates-stamped for identification.
5. Some of these requests are directed to electronically stored information, including e-mails and word-processing documents stored on your computer(s). Where practical, responsive information should be produced in native format, not converted to images or printouts. Plaintiff does not require that such documents be produced with Bates stamps, provided each document has a unique file name.

¹ See, e.g., *Bottoms v. Liberty Life Assur. Co. of Bos.*, No. 11-CV-01606-PAB-CBS, 2011 WL 6181423, at *7 (D. Colo. Dec. 13, 2011) ("The responding party is obligated to reasonably construe the discovery requests ... and cannot evade its obligations under Rules 33 and 34 by summarily dismissing an interrogatory or request for production as 'overbroad.'").

6. Please organize responses to the requests for production of documents so that it can be determined which documents respond to which request.

REQUESTS FOR INSPECTION

1. Produce all documents described in your initial disclosures.

RESPONSE:

2. Produce records of all phone calls to or from any phone you regularly used from October 1, 2020 through August 31, 2021.

RESPONSE:

3. Produce records of all text messages related to Mr. Williamson or the allegations in his Complaint, to or from any phone you regularly used from October 1, 2020 forward.

RESPONSE:

4. Produce all e-mails mentioning or related to Harry Williamson from January 1, 2020 forward.

RESPONSE:

5. Produce all records related to the relationship between Harry Williamson and Michelle Hung.

RESPONSE:

6. Produce all records of correspondence with any member of the press related to Harry Williamson, from October 1, 2020 forward.

RESPONSE:

7. Produce all records of correspondence with Amanda Martinsek.

RESPONSE:

8. Produce all records of correspondence with William Edwards.

RESPONSE:

9. Produce all records of correspondence with William Novak.

RESPONSE:

10. Produce all records related to plans to restructure the Lorain County Veterans' Committee, from January 1, 2020 forward.

RESPONSE:

11. Produce all records related to the “Seven Districts plan,” i.e., the proposal to replace the at-large Board of Commissioners with a board comprising representatives from different districts across the county.

RESPONSE:

12. Produce all contracts related to the plan to build a convention center at or near Midway Mall.

RESPONSE:

13. Produce all records related to the plan to build a convention center at or near Midway Mall.

RESPONSE:

14. Produce all records related to the bidding process for new emergency-management communications devices.

RESPONSE:

15. Produce all records related to the termination of Harry Williamson’s employment.

RESPONSE:

16. Produce all records related to the termination of Tim Carrion’s employment.

RESPONSE:

17. Produce the Ulmer & Berne memo regarding the termination of Harry Williamson’s employment.

RESPONSE:

18. Produce monthly statements for all financial accounts (for instance, checking accounts, savings accounts, credit union accounts, certificates of deposit, 401(k) accounts and IRAs) you maintained individually or jointly with any others, from January 1, 2021 forward.

RESPONSE:

19. Produce monthly statements for any financial accounts over which you have had signature authority in any capacity, regardless of whether or not the account or accounts have been closed, from January 1, 2021 forward.

RESPONSE:

20. Produce all monthly statements, receipts and records of all debit card, credit card and/or charge account you held, used, or maintained individually or jointly with any others, from January 1, 2021 forward.

RESPONSE:

21. Produce all monthly statements for any other accounts for which you were or are authorized to charge purchases to the accounts of another person or entity, regardless of whether or not the account or accounts have been closed, from January 1, 2021 forward.

RESPONSE:

22. Produce all stock certificates, bond certificates, mutual funds certificates, and any other evidence of ownership or of any interest in any securities, investments, trust funds, mutual funds, liquid-asset funds, or other funds naming you as an owner, individually or jointly with any others, from January 1, 2021 forward.

RESPONSE:

23. Produce all federal, state, and local income tax returns you filed individually or jointly with any others, including accompanying schedules, attachments, worksheets used in preparing them, and requests for extensions, from January 1, 2021 forward.

RESPONSE:

24. Produce each Form 1099, Form 1065, and Form W2 you received, from January 1, 2021 forward.

RESPONSE:

25. Produce all resumes, employment application forms, letters, notices or other papers relating to any effort on your part to investigate employment opportunities for yourself from January 1, 2021 forward.

RESPONSE:

26. Produce all personal financial statements or net worth statements submitted to any bank, lending institution, individual, or any other entity, from January 1, 2021 forward.

RESPONSE:

27. Produce all promissory notes, stock option agreements, or other instruments evidencing any financial obligation due you now or in the future.

RESPONSE:

28. Produce all documents or letters received from any real estate agent, accountant, bank officer, stockbroker, or any other person or entity, notifying you of the value of your interest in any corporation, trust, reversionary interest, real property, real property, or any other asset, from January 1, 2021 forward.

RESPONSE:

29. Produce all documents or other instruments creating a testamentary trust, *inter vivos* trust or other trust in which you are a beneficiary or may reasonably expect to receive some financial distribution now or in the future.

RESPONSE:

30. Produce all documents, memoranda, closing statements or writings relating to any interest you had or may have in real estate, whether as owner, co-owner, fiduciary, trust beneficiary (vested or contingent), partner, limited partner, shareholder, joint venturer, mortgagee, developer, manager or otherwise.

RESPONSE:

31. Produce copies of all real estate mortgages held by you, or by any entity in which you have or had a present or contingent interest (for instance, realty trusts, partnerships or corporations), from January 1, 2021 forward.

RESPONSE:

32. Produce the title to any automobile, watercraft, aircraft, or other vehicle you owned individually or jointly with any others, from January 1, 2021 forward.

RESPONSE:

33. Produce documentation of the value of any other assets not disclosed through the above requests.

RESPONSE:

34. Produce all documents supporting your statute of frauds defense.

RESPONSE:

35. Produce all documents supporting your improper joinder defense.

RESPONSE:

36. Produce all documents supporting your statute of limitations defense.

RESPONSE:

37. Produce all documents supporting your estoppel defense.

RESPONSE:

38. Produce all documents supporting your waiver defense.

RESPONSE:

39. Produce all documents supporting your laches defense.

RESPONSE:

40. Produce all documents supporting your unclean hands defense.

RESPONSE:

41. Produce all documents supporting your ratification defense.

RESPONSE:

42. Produce all documents supporting your accord and satisfaction defense.

RESPONSE:

43. Produce all documents supporting your acquiescence defense.

RESPONSE:

Respectfully submitted,

/s/Brian D. Bardwell

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CERTIFICATE OF SERVICE

I certify that on April 16, 2024, this document was served on opposing counsel as provided by Civ. R. 5(B)(2)(b)(f).

/s/Brian D. Bardwell

Brian D. Bardwell (0098423)
Attorney for Plaintiff Harry Williamson